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7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 DEANA HOUGHTON,

11 Plaintiff,

12 vs.

13 SAFEWAY, INC., a Delaware Corporation,

14 Defendant.
15

No. 2:21-cv-00030

NOTICE OF REMOVAL TO
FEDERAL COURT

16 Please take notice that Defendant Safeway Inc. hereby removes to the United
17 States District Court for the Western District of Washington the action described below.
18 On November 16, 2020, Defendant Safeway Inc. was served with a summons
19 (**Attachment 1**) and complaint (**Attachment 2**) in an action entitled *Deana Houghton v.*
20 *Safeway, Inc. et al.*, King County Superior Court No. 20-2-16594-8. The first date upon
21 which Safeway Inc. received a copy of this complaint was November 16, 2020.

22 The complaint does not specify the amount of damages being claimed by the
23 Plaintiff. On November 19, 2020, Safeway propounded a request for a statement of
24 damages and discovery requests which asked Plaintiff to disclose the damages Plaintiff
25 is claiming in this matter. On December 14, 2020, Plaintiff provided Safeway with a

NOTICE OF REMOVAL TO
FEDERAL COURT - 1

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Turner Kugler Law, PLLC

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Seattle, WA 98136
(206) 659-0679

1 statement of damages claiming more than \$67,000 in special damages and \$340,000 in
2 general damages, plus loss of income in an amount that has not yet been determined.

3 There is complete diversity because the Plaintiff is a citizen of the State of
4 Washington and Defendant Safeway Inc. is a corporation organized under the laws to the
5 State of Delaware with its principle place of business in the State of California.

6 This court has original jurisdiction over this action pursuant to 28 U.S.C. §1332(a)
7 because it is between citizens of different states and the amount in controversy exceeds
8 \$75,000. This claim is removable to federal court by the defendant pursuant to 28 U.S.C.
9 §1441 based on diversity jurisdiction.

10 INTRADISTRICT ASSIGNMENT

11 The case is currently pending in King County so LCR 3(e) indicates it will be
12 initially assigned to a Seattle Judge.

13 A civil case cover sheet is attached as **Attachment 3**.

14 TURNER KUGLER LAW, PLLC

15 By: s/ John T. Kugler
16 John T. Kugler, WSBA # 19960
Attorney for Defendant



CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

none

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

Attorney for Plaintiff:
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s/ John T. Kugler
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